


FILED
OCT 23 2012

CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA,

CR 12-50146

Plaintiff,

INDICTMENT

vs.

False Statement
(18 U.S.C. § 1001)

MELODY WOUDEN, a/k/a MELODY
DELONG,

Defendant.

Larceny
(18 U.S.C. §§ 7(3) and 661)

The Grand Jury charges:

COUNT I

On or about September 6, 2012, in the District of South Dakota, the defendant, Melody Wouden, a/k/a Melody DeLong, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of a department and agency of the United States, to wit: the defendant, Melody Wouden, a/k/a Melody DeLong, provided a written statement to Investigator Guy Heidenreich of the United States Department of Labor, Office of Labor-Management Standards, in which she stated the following in reference to money she had received from the American Federation of Government Employees Local 2342: "This money (the \$230 and the \$587) sat in envelopes from the time I cashed the checks until I found the envelopes inside a box of records" The defendant, Melody

Wouden, a/k/a Melody DeLong, then and there knew this statement and representation was false, all in violation of 18 U.S.C. § 1001.

COUNT II

On or about between August 31, 2009, and April 4, 2012, in the District of South Dakota, the defendant, Melody Wouden, a/k/a Melody DeLong, at a place within the special maritime and territorial jurisdiction of the United States, namely, the VA Black Hills Health Care System, Ft. Meade Campus, on land acquired for the use of the United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and purloin, the personal property of another, namely, money of the American Federation of Government Employees Local 2342, of a value under \$1,000, all in violation of 18 U.S.C. §§ 7(3) and 661.

A TRUE BILL:

(NAME REDACTED)

Foreperson

BRENDAN V. JOHNSON
United States Attorney

By: 